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**[ADDITIONAL COUNSEL ON  
 FOLLOWING PAGE]**

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 EASTERN DIVISION – RIVERSIDE**

STEPHENSON AWAH TENENG,  
 MARCEL NGWA, ANKUSH KUMAR,  
 GURJINDER SINGH, ATINDER PAUL  
 SINGH, NOE MAURICIO GRANADOS  
 AQUINO, and all others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the  
 United States,  
 KIRSTJEN NIELSEN, Secretary  
 Department of Homeland Security;  
 RONALD D. VITIELLO, Acting Director,  
 Immigration and Customs Enforcement;  
 DAVID MARIN, Field Office Director, Los  
 Angeles Field Office of Immigration and  
 Customs Enforcement;  
 JEFFERSON BEAUREGARD SESSIONS,  
 III, U.S. Attorney General;  
 HUGH J. HURWITZ, Acting Director,  
 Federal Bureau of Prisons,  
 DAVID SHINN, Warden, FCI Victorville  
 Medium Security Prison I/II, in their official  
 capacities only,

Defendants.

Case Number:

5:18-cv-01609-JGB-KK

**DECLARATION OF  
 NANCY HARRIS IN  
 SUPPORT OF  
 PLAINTIFFS' MOTION  
 FOR CLASS  
 CERTIFICATION**

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26 Attorneys for Plaintiffs, on *behalf of*  
27 *themselves and others similarly situated*  
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1 I, Nancy Harris, declare as follows:

2 1. I am an attorney at law admitted to practice before the courts of the  
3 State of California and before this Court. I am a Principal and Chair of the  
4 Commercial Litigation Practice Group at the law firm of Meyers, Nave, Riback,  
5 Silver & Wilson (“Meyers Nave”), and counsel for Plaintiffs in this litigation. I  
6 make this declaration in support of Plaintiffs’ Motion for Class Certification. If  
7 called as a witness, I would and could competently testify to the facts stated herein,  
8 all of which are within my personal knowledge.

9 2. The attorneys at Meyers Nave are committed to the vigorous,  
10 effective, and efficient prosecution of the interests of Plaintiffs and the proposed  
11 class (the “Class”) and the subclass.

12 3. For more than thirty years Meyers Nave has served public, private, and  
13 non-profit organizations located throughout California, as well as clients based in  
14 other states who have interests in California. We are a full-service law firm with  
15 six offices across California, and provide legal and regulatory expertise to public  
16 and private entities. We regularly litigate complex federal litigation cases, including  
17 class actions, and as a firm are committed to providing pro bono assistance to  
18 underserved populations. I have twenty years of experience in class action and  
19 commercial litigation relating to business disputes, regulatory compliance  
20 investigations, governmental compliance investigations, and related litigation. I  
21 have represented defendants in class action lawsuits, including class certification  
22 proceedings.

23 4. I have committed a substantial amount of my professional endeavors  
24 to representing individuals and organizations in seeking the vindication of basic  
25 civil rights. I served on the Board of Directors of the Lawyers’ Committee for Civil  
26 Rights of the Bay Area from 2006 to 2016, and was Co-Chair of the Board from  
27 2008-2012. The Lawyers’ Committee is a civil rights and legal services  
28 organization that works to advance and promote the legal rights of communities of

1 color, and low-income persons, immigrants and refugees. In 2010, a team I lead  
2 was awarded the Jack W. Londen Award for Civil Rights Impact Litigation by the  
3 Lawyers' Committee. In 2006, a litigation team I co-led at Orrick, Herrington &  
4 Sutcliffe representing elderly victims of mortgage fraud was awarded the Founders'  
5 Award by the Law Foundation of Silicon Valley.

6 5. The Meyers Nave lawyers participating in this action include litigators  
7 and public law attorneys with more than seventy-years of combined experience  
8 representing public agencies and companies in complex litigation and regulatory  
9 matters.

10 6. Meyers Nave has dedicated and will continue to dedicate resources to  
11 the representation of this class.

12 Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the  
13 foregoing is true and correct.

14 Executed this 30th day of August, 2018, in Oakland, California.

15  
16 s/ Nancy Harris  
17 Nancy Harris  
18 *Attorney for Plaintiffs*  
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